

Joint Letter on Discovery, Page 1

**October 16, 2020**

**VIA ECF**

Honorable Magistrate Judge Debra Freeman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Kumaran vs. Northland Energy Trading et al* 1:19-Cv-08345 (MKV-DCM)

**JOINT LETTER ON DISCOVERY**

Dear Honorable Magistrate Judge Debra Freeman;

Pursuant to FRCP 37 and in accordance with Order 55, the parties joint ability to amend the schedule the parties have agreed to the following dates for discovery as set forth in this letter. This in consideration of the additional work for both parties on the Motion To Dismiss as well as ongoing impacts and inconveniences of scheduling with coronavirus which have slowed down the parties ability to access files and documents, and other remote working interferences

Plaintiffs supplied an Rule 30(b)(6) for Daniel Lothrop and Domenic Bramante on June 11, 2020 and June 30, 2020 which included requests for depositions. Defendants responded on or around July 13, 2020 and July 30, 2020. All parties supplied Initial Discovery Requests and Interrogatories on August 13, 2020 which included definitions and instructions. Plaintiffs are responding with a deficiency notice to Lothrop and Bramante. Both parties were involved in Motion To Dismiss practice with filing dates on September 9, 2020 (ECF 73,74,75) ) and September 29, 2020 (ECF 77 ).

The parties have agreed to reset the Discovery Dates as follows

**Deadline to Respond to Initial Discovery Requests: November 6, 2020**

**Deadline to Complete Discovery: February 5, 2021**

The change in schedule has been necessary in part because of additional workload in the Motion to Dismiss, as well as unusual and abnormal interference in scheduling and other ongoing interference (such as school closures and remote working adjustments) due to Coronavirus, which periodically cause quarantines, slowing down the process. The parties can focus on the discovery now no other motion practice is currently due.

The parties are in agreement on the schedule. The parties are still working on differences in the scope and wording of the requests of discovery prior to burdening the Court with motion practice and this schedule permits more time to resolve differences.

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Respectfully submitted,

//SSK//

Samantha Siva Kumaran

Individual Plaintiff

//JLE//

Joshua Esptein

Counsel for The A Star Group, Inc

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525

//ELT//

Ellen Tobin

Counsel for Defendants

Westerman Ball Ederer Miller Zucker & Sharfstein, LLP

1201 RXR Plaza, Uniondale, New York 11556